

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT TRUMAN, derivatively on behalf of
IROBOT CORPORATION,

Plaintiff,

v.

COLIN M. ANGLE, ALISON DEAN,
MOHAMAD ALI, MICHAEL BELL,
RONALD CHWANG, DEBORAH G.
ELLINGER, ELISHA FINNEY, RUEY-BIN
KAO, ANDREW MILLER, and MICHELLE V.
STACY,

Defendants,

-and-

IROBOT CORPORATION,

Nominal Defendant.

Case No.: 1:20-cv-10034-DJC

**[PROPOSED] ORDER: (1)
CONSOLIDATING RELATED
SHAREHOLDER DERIVATIVE
ACTIONS; AND (2) APPOINTING
LEAD COUNSEL**

DAVID KATZ and THOMAS WIGHTMAN,
Derivatively on Behalf of IROBOT
CORPORATION,

Plaintiff,

v.

MOHAMAD ALI, MICHAEL BELL, RUEYBIN
KAO, ANDREW MILLER, ELISHA
FINNEY, MICHELLE V. STACY, COLIN M.
ANGLE, and DEBORAH ELLINGER,

Defendants,

-and-

IROBOT CORPORATION,

Nominal Defendant.

Case No.: 1:20-cv-10089-DJC

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ALEXA RUHFASS, Derivatively on Behalf
of iROBOT CORPORATION,

Plaintiff,

v.

MOHAMAD ALI, MICHAEL BELL,
RUEYBIN KAO, ANDREW MILLER,
ELISHA FINNEY, MICHELLE V. STACY,
COLIN M. ANGLE, DEBORAH
ELLINGER, ALISON DEAN, RONALD
CHWANG, GAIL DEEGAN, ANDREA
GEISER, CHRISTIAN CERDA, RUSSELL
J. CAMPANELLO, AND GLEN D.
WEINSTEIN,

Defendants,

-and-

iROBOT CORPORATION, a Delaware
corporation,

Nominal Defendant.

WILLIAM TASCO, derivatively on behalf of
iROBOT CORPORATION,

Case No.: 1:20-cv-10253-DJC

Plaintiff,

v.

COLIN M. ANGLE, ALISON DEAN,
MOHAMAD ALI, MICHAEL BELL,
RONALD CHWANG, DEBORAH G.
ELLINGER, ELISHA FINNEY, RUEY-BIN
KAO, ANDREW MILLER, and MICHELLE V.
STACY,

Defendants,

-and-

iROBOT CORPORATION,

Nominal Defendant.

THIS MATTER HAVING been presented to the Court by stipulation between Plaintiffs Robert Truman, David Katz, Thomas Wightman, Alexa Ruhfass and William Tasco (collectively, “Plaintiffs”) and all Defendants, and the Court having read the parties’ papers and good cause appearing,

IT IS HEREBY ORDERED as follows:

I. CONSOLIDATION

1. The following actions are related and consolidated for all purposes, including pre-trial and trial, under Civil Action No. 1:20-cv-10034-DJC (collectively the “Consolidated Action”):

<u>Case Name</u>	<u>Case Number</u>	<u>Dated Filed</u>
<i>Truman v. Angle, et al.</i>	1:20-cv-10034-DJC	January 9, 2020
<i>Katz v. Ali, et al.</i>	1:20-cv-10089-DJC	December 20, 2019 (filed in S.D.N.Y. originally)
<i>Ruhfass v. Ali, et al.</i>	1:20-cv-10133-DJC	January 22, 2020
<i>Tasco v. Angle, et al.</i>	1:20-cv-10253-DJC	February 10, 2020

2. The Consolidated Action shall bear the following caption:

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE iROBOT CORPORATION
DERIVATIVE LITIGATION,

This Document Relates to:

ALL ACTIONS

Lead Case No. 1:20-cv-10034-DJC

3. All papers filed in connection with the Consolidated Action need only be filed in Civil Action No. 1:20-cv-10034-DJC.

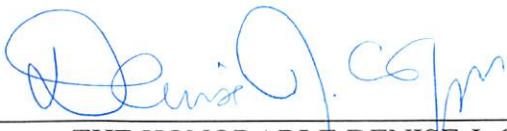
4. This Order shall apply to each derivative action brought on behalf of iRobot Corporation subsequently filed in, removed to, or transferred to, the United States District Court of Massachusetts that relates to the same subject matter as the Consolidated Action. Any such subsequently-filed action shall be automatically consolidated into the Consolidated Action, except that nothing in the foregoing shall be construed as a waiver of Defendants' right to object to consolidation of any subsequently-filed or transferred related action.

II. APPOINTMENT OF LEAD COUNSEL AND LIAISON COUNSEL

5. Gainey McKenna & Egleston and The Rosen Law Firm, P.A. are appointed Lead Counsel in the Consolidated Action.

- 6. The Law Office of Michael P. Utke, LLC is appointed as Liaison Counsel.
- 7. Lead Counsel shall have sole authority to:
 - a. determine and present (in briefs, oral argument, or such other fashion as may be appropriate, personally or by a designee), to the Court and opposing parties, the position of the Plaintiffs on all matters arising during pretrial proceedings;
 - b. coordinate the initiation and conduct of discovery on behalf of Plaintiffs, consistent with the requirements of the Federal Rules of Civil Procedure and Local Rules;
 - c. conduct settlement negotiations on behalf of Plaintiffs;
 - d. delegate specific tasks to other counsel in such a manner as to ensure that pre-trial preparation for Plaintiffs is conducted efficiently and effectively;
 - e. enter into stipulations and/or agreements with opposing counsel as necessary for the conduct of the litigation;
 - f. monitor the activities of all counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided; and
 - g. perform such other duties as may be incidental to the proper coordination of Plaintiffs' pre-trial activities or authorized by further order of the Court.

SO ORDERED this 25th day of March, 2020.



THE HONORABLE DENISE J. CASPER
UNITED STATES DISTRICT JUDGE